

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

**US DISTRICT COURT  
WESTERN DIST ARKANSAS  
FILED**

**MAR 18 2016**

**DOUGLAS F. YOUNG, Clerk  
By**

**Deputy Clerk  
PLAINTIFFS**

**ALVIN BAILEY AND IFE BAILEY**

**v.**

**Case No. 16-5068 TLB**

**ADA MAYE JONES DIPPEL, CRST  
EXPEDITED, INC. AND CRST INTERNATIONAL,  
INC., JOHN DOE 1 AND JOHN DOE 2**

**DEFENDANTS**

**NOTICE OF REMOVAL**

Please take notice that the captioned case filed as Case No. 72CV-16-494-5 in the Circuit Court of Washington County, Arkansas has been hereby removed to the United States District Court for the Western District of Arkansas, Fayetteville Division. The Defendants file this Notice of Removal and state, as grounds for removal, the following:

1. This action was commenced by the filing of a Summons and Complaint in the Circuit Court of Washington County, Arkansas on March 7, 2016, and was assigned case number 72CV-16-494-5. A copy of the Complaint and pleadings currently on file with the Washington County, Arkansas, Circuit Court are attached as Exhibit "A" to the Notice of Removal.

2. Plaintiffs Alvin Bailey and Ife Bailey have alleged in their Complaint that they are residents of St. Petersburg, Pinellas County, Florida. (Exhibit "A," Complaint.)

3. Defendants CRST Expedited, Inc. and/or CRST International, Inc. are corporations which are neither incorporated in nor have their principal places of business in the State of Arkansas. Defendant Ada Maye Jones Dippel is, upon information and belief, a citizen and resident of the State of California.

4. This is a civil action in which plaintiff seeks compensatory in an amount in excess of that required for federal diversity jurisdiction. (Exhibit "A", Complaint.)

5. Therefore, this action is one over which a federal district court has original jurisdiction because there is complete diversity of citizenship between the parties pursuant to 28 U.S.C. § 1332, and this case is removable under 28 U.S.C. § 1441(a) under the procedures set forth in 28 U.S.C. § 1446.

6. Defendant has given written notice of this removal by filing copies of this Notice of Removal with the Circuit Clerk of Washington County, Arkansas, and by mailing copies of this Notice of Removal to Plaintiff's attorney.

7. No admission of fact, law or liability is intended by the filing of this notice, and all defenses, motions and pleas are expressly reserved.

WHEREFORE, Defendants give notice that this case has been removed from the Circuit Court of Washington County, Arkansas, to the United States District Court for the Western District of Arkansas, Fayetteville Division.

Respectfully submitted,

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BY: \_\_\_\_\_

  
KARA B. MIKLES, BAR NO. 2003088

**CERTIFICATE OF SERVICE**

I, Kara B. Mikles, state that on this 17<sup>th</sup> day of March, 2016, a true and correct copy of the foregoing pleading was mailed to:

James M. Lloyd  
Lloyd Law Firm  
100 W. Center Street  
Fayetteville, Arkansas 72702



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KARA B. MIKLES